

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 18-CR-154

VAN L. MAYES,

Defendant.

UNOPPOSED MOTION TO STAY BRIEFING SCHEDULE

COMES NOW the above named defendant, Van Mayes, through Attorney Robert LeBell, and hereby moves the Court, by joint agreement with the government, to stay the motion schedule in this matter, for the reasons stated below.

AS GROUNDS THEREFORE the defendant states the following:

AUSA Christopher Ladwig and counsel have had a number of discussions to resolve issues related to discovery. The following is proposed to the court, in light of the issues that remain: The defense will initially file Motions to Compel certain discovery documents, which are presently redacted to an unredacted format, as well as for the identification of specific government witnesses. The redactions for which disclosure is sought relate to both the substance of the witnesses' statement, as well as the identity of the declarant. The government disputes whether there are substantive redactions. The defense asserts that investigation which is needed to be conducted in this matter, as well as, the

preparation of pretrial motions, are stalled until this information can be obtained from the government. The parties request that the court stay the motion schedule until it can address these discovery concerns. Counsel will file motions addressing the discovery issues shortly. While alternative means of disclosure have been discussed at length with Mr. Ladwig, it appears that the court's direction is needed at this time.

Dated at Milwaukee, Wisconsin this 6th day of May, 2020.

Respectfully submitted,

/s/ Robert G. LeBell

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